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Date March 11, 2005
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5 CMI QAPP	8 Endangered Species Act
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Note	Transmittal	Letter	to	Be	included	with	Reports
്വന്ന					_		



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

DE-9J

MAR 12 2004

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Will Belitz
Plant and Environmental Services Manager
American Finishing Services, Inc.
476 Clay Street
P.O. Box 164
Chilton, WI 53014

Re: Notice of Violation and Return to Compliance

RCRA Compliance Evaluation Inspection

American Finishing Resources, Inc. EPA I.D. No.: WID 980 901 391

Dear Mr. Belitz:

On March 3, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the American Finishing Resources (AFR) facility in Chilton, Wisconsin. The purpose of the inspection was to evaluate AFR's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment, and storage of hazardous waste. Please find an enclosed copy of the inspection report and checklist for your reference.

Based on information provided AFR personnel, a review of records, and physical observations by the inspectors, U.S. EPA finds that AFR is engaged in the management of hazardous waste without a hazardous waste storage license and is in violation of the requirements of the Wisconsin Administrative Code and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage license, a large quantity generator must be in compliance with the conditions of Wisconsin Administrative Code, ss. NR 615.05(4) and 615.05(6)(a) [40 CFR § 262.34(a)]. Specifically, we find that AFR is in noncompliance with the following conditions for a storage license exemption, and is in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage license, a large quantity generator must immediately amend the facility contingency plan when the list of emergency coordinators changes. See, ss. NR 615.05(6)(a) and (b), 615.05(4)(a)(6), 630.22(1)(c)(4). [40 CFR §§ 262.34(a)(4); 265.54(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under NR 630.22(1)(c)(4) [40 CFR § 264.54(d)].

On the day of the inspection, the 2001 contingency plan did not include the name of the current secondary Emergency Coordinator, Eric Ebben. AFR therefore failed to comply with the above-mentioned condition for a license exemption, and violated a storage facility contingency plan requirement.

2. A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of ss. NR 615.05(4) and (6)(a), is an operator of a hazardous waste storage facility, and is required to apply for and obtain a hazardous waste storage license. See, ss. NR 615.05(6)(a) and (b); and 680.30, 680.31(2), and 680.32(2) [40 CFR §§ 262.34 (a),(b); 270.1(c); 270.10(a),(d)]. On failing to comply with the condition for a license exemption referenced in item 1 above, AFRs failure to apply for and obtain a hazardous waste storage license violated the licensing requirements of NR 680.30, 680.31(2), and 680.32(2) [40 CFR §§ 270.1(c); 270.10(a),(d)].

At this time, EPA is not requiring AFR to apply for a storage license, because in response to the violations listed above, AFR submitted on March 4, 2004, an amended page for their contingency plan. The page includes the name, address, and phone numbers of Eric Ebben, the current secondary emergency coordinator. The U.S. EPA has reviewed this response, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and the Wisconsin Department of Natural Resources will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Brenda Oswald at (312) 353-4796.

Sincerely,

Paul Little, Chief

Compliance Section # 2

Enforcement and Compliance Assurance Branch

Waste, Pesticides and Toxics Division

Enclosures

cc: Jason Moeller, WDNR



## Waste, Pesticides and Toxics Division

Type of Document:	Notice of Violation and Inspection Report/Checklist						
	☐ No Violation Letter and Inspection Report/Checklist						
	☐ Letter of Acknowledgment						
	☐ Information Request						
550 N	☐ Pre-Filing and Opportunity to Confer						
	☐ State Notification of Enforcement Action						
Facility Name :	AMERICAN FINISHING RESOURCES, INC.						
Facility Location:	476 CLAY STREET						
Facility Location:  City: CHICT	,						
City: CHICT	,	-					

Name	Signature	Date
Author	Bruke Corulal	3/10/04
Regional Counsel	Concurred by e-mil M. H. Clary	3-10-04
Section Chief	Poul Latte	3-14-04
Branch Chief		

#### **Directions/Request for Clerical Support:**

After the Section Chief/Branch Chief signs this sheet and original letter:

- 1. Date stamp the cover letter;
- 2. Make four copies of the contents of this folder:

One copy for the assigned staff;

One copy for the section file;

One copy for the branch file; and

One copy for the official file.

- 3. Make any additional copies for cc's or bcc's.
- 4. Mail the original certified mail and distribute office copies and cc's and bcc's. Once the certified mail receipt is returned:
- 5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
- 6. E-mail staff the date that the letter was received by facility.

7001 03 200006 0177 2589

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, ILLINOIS 60604

#### **MEMORANDUM**

DATE:

March 9, 2004

TO:

File

FROM:

Brenda Oswald - Environmental Engineer

Waste, Pesticides and Toxics Division

Enforcement and Compliance Assurance Branch

Compliance Section 2

SUBJECT:

Inspection Notes for March 3, 2004

Compliance Evaluation Inspection American Finishing Resources, Inc.

WID 980 901 391

Large Quantity Generator

A Compliance Evaluation Inspection (CEI) of the American Finishing Resources, Inc. facility located at 476 Clay Street, Chilton, Wisconsin, was conducted on March 3, 2004. The following people were present for this inspection:

Doug Poe - President

American Finishing Resources

Will Belitz - Plant & Environmental Svcs. Mgr.

American Finishing Resources

Jason Moeller - Waste Management Specialist

**WDNR** 

Brenda Oswald - Environmental Engineer

U.S. EPA

American Finishing Resources, Inc. (AFR) specializes in removing paints and coatings from manufactured parts, paint hooks, fixtures and racks. Some of the paint that AFR removes contains chromium. Therefore, all of the paint waste is shipped as hazardous waste with the D007 waste code. AFR's processes are used to strip materials such as steel, stainless steel, spring steel, aluminum, brass, copper and some plastics. When the stripping is complete, the base material is then coated with a rust inhibitor, packaged, and returned to the client. AFR also has a manufacturing line for producing paint racks and patented fixtures. AFR, originally named Thermal Clean, Inc., has been operating at this site since the building was constructed in 1983.

An official name change to the current name, American Finishing Resources, Inc. took place in 1997.

AFR utilizes three different methods to remove coatings: one bake and rinse operation, and two different dip techniques. The baking process has one line for production parts and another line for non-production equipment. The production parts are intended to be sold by the manufacturer, but do not meet their manufacturing painting specifications. The faulty part is sent to AFR to be stripped, recoated with a rust-resistant seal, and then returned to the client for another painting attempt. The non-production parts include the hooks and racks used to hold production parts in industrial paint lines. Both lines utilize the same paint-removal process. First, the parts bake in large oxygen-controlled ovens at precise temperatures ranging between 725 and 850°F plus or minus 2°F. Next, the parts are removed from the oven after baking for a prescribed time, and are allowed to cool until the dry ash flakes off the surfaces. The ash is drummed in containers before being transported daily to the less than 90 day storage area. At this point, some of the ash is still bonded to the parts. The third phase of the process, therefore, involves a series of baths to remove this remaining ash. The baths are in the following order: alkaline, rinse, acid, 2 rinses, and alkaline. After the baths, the parts are run through a power washer, then are placed on a conveyor belt for the rust inhibitor application. The products are then ready for packaging and shipment back to the customer.

The first of the two dip techniques is used for particular steel products, such as spring steel and OSHA certified chains, that are sensitive to the high temperature of the ovens. The chemical strip tank used for this procedure is located next to the last tank in the non-production line. Only steel is dipped in this tank. The product is then removed and rinsed with the power washer, rinsed with the power washer, coated with rust inhibitor, and packaged for delivery.

The aluminum dip tank uses a relatively new process involving one dip tank, a drip tank, and a centrifuge. The products are loaded into a cage, which is lowered for between an hour and a half and five hours into a solution of 2-amino ethanol and potassium hydroxide that removes the paint. The cage is then raised and held over a drip tank where the drippings are recycled back into the first tank. The parts then follow the same procedure beginning with power washing as listed in the baking detail above. In the meantime, a centrifuge separates the paint residue from the solution in the first tank. The residue is pulled out and is drummed in hazardous waste satellite containers near the process. When the solution in this tank is ready for removal and replacement, it is piped directly to a tanker truck and is shipped as D002 hazardous waste.

The facility maintains its own waste water treatment system. A slight slope in the floor of the facility allows the run off from the power washer and renegade ash flakes from the ovens to congregate in a trough that runs through the facility directly to the treatment system. The filter cake from the sludge press is combined in the 90 day storage area with the paint waste from the stripping systems.

#### Facility Walkthrough

The tour began at the production and non-production bake and dip lines. Twelve large ovens lined both the north and south walls of this portion of the facility. The product from the customers are placed on racks numbered specifically for each customer. The racks are weighed before and after the stripping process to determine the amount of paint that was removed from the parts. One rack was cooling outside of an oven and the ash was peeling off of the product surfaces. At the end of the day, the ash from this rack is shoveled into a 55 gallon hazardous waste satellite accumulation drum next to the oven and is transported to the 90 day storage area when the drum is full. Site personnel explained that this drum (as well as all of the other D007 drums) has a hazardous waste label on it with the waste code D007 for chromium even though the content of chromium in the waste ash is well below hazardous waste requirements. The rinsing tanks for the production and non-production lines are side by side in the middle of the room. The contents of the tanks are reused nine times before being routed to the waste water treatment system. The tanks are cut into the floor of the facility. Any spillage flows toward the trough in the floor that takes it directly to the waste water treatment system. The chemical dip tank for the steel products is covered when not in use.

The aluminum dip system is segregated from the rest of the facility by a 6-inch high containment curb. The dip tank was closed at the time of the inspection, and there was a minimal amount of solution in the drip tank. Beneath the centrifuge, which is attached to the dip tank, was a 55 gallon drum with a small hopper on top of it to collect the extruded paint residue (Appendix 1; Picture #1). There were three other satellite containers near the process that were properly labeled as hazardous waste with the D007 code, but were empty at the time of the inspection.

The less than 90 day storage area is located in one of the truck bays on the southwest side of the facility. The only container in the area was as 20 cubic yard roll off box where cadmium tainted waste is dumped daily (Appendix 1; Picture #2). The segmented container lid is closed by large springs and fasteners when waste is not being added. The roll off box is labeled as D007 hazardous waste and is dated 3/01/04. This container is removed from site approximately once a month and is returned within one day to continue filling.

In the northwest corner of the building is the waste water treatment system. This area is also enclosed in a 6-inch high containment barrier. The system consists of an acid neutralization tank and an alkaline neutralization tank along with a settling treatment tank in the rear. At the time of the inspection, 4 full satellite drums containing dried filter cake and labeled as hazardous waste with the D007 waste code were awaiting removal via forklift to the 90 day storage area across the room. This treatment system produces approximately 6 to 8 drums of filter cake per day. The drums are removed daily.

This facility does use fluorescent bulbs. At the time of the inspection, all bulbs had been shipped the week prior to Onyx Environmental in Wisconsin.

The Walk-Through concluded at this time.

#### Records Review

#### Training Records:

The training records are kept in separate binders for each individual at the facility. Each binder includes the job description and a detailed listing of the training requirements for that particular position. Each person is trained annually for hazardous waste management and is also given a special training specific to the duties of his or her position. On 12/15/03, the main handlers of hazardous waste at the facility received their annual refresher. Their names are as follows: Will Belitz, Ted Goodwin, Wayne Hoerth, Jerry Rausch, and Wayne Schwarze. Each person's binder is kept at the facility for the duration of the worker's employment and three years after termination.

#### Contingency Plan:

A comprehensive contingency plan dated from July 7, 2001, is maintained at the facility. The plan includes descriptions of the actions personnel must take in response to unplanned releases of hazardous waste, arrangements with local police departments, fire departments and hospitals, lists of emergency equipment and spill control measures, and maps of escape routes. The listing of the primary emergency coordinator, Will Belitz, was up to date and complete with phone numbers and addresses. The secondary emergency coordinator was not up to date. Will Belitz faxed the updated page on 3/4/04, the day following the inspection. Eric Ebban is the current secondary coordinator. His information is also complete with address and telephone numbers.

#### Hazardous Waste Manifests:

All waste manifests are kept on site since 1983. Generally, in the past three years, D007 chromium waste has been the only manifested waste generated at the facility. The TSD facility to which the waste is sent is ONYX Environmental Services, LLC, in Wisconsin. Universal waste is also sent to ONYX. Recently, on 12/3/03, a shipment of 3000 gallons of waste corrosive liquid (D002) from the aluminum strip bath was sent to ONYX. This waste is pumped directly from the tank. This shipment is rare because the centrifuge that separates the residue from the solution allows for an extended usage period.

#### Hazardous Waste Profiles:

The most recent profiles done on the hazardous wastes produced at this facility are dated 9/14/03. The three process wastes tested include: waste ash from the ovens, aluminum process waste (dip and centrifuge) and steel process waste (dip). Three labs are utilized in the analysis of the wastes. Each lab has it's own Wisconsin Lab Certification Number as follows:

Cardinal Environmental: #460024950 Northern Lake Services: #721026460

Thomas Edison Technical Center: #252021770

The TCLP results of the recent profiles indicate chromium levels in each waste are below 5 mg/L. The ash has the highest level with 0.500 mg/L chromium. Even though these low levels are non-hazardous, the waste is still shipped as hazardous as a precaution. Also, the caustic liquid solution used in the aluminum bath has a pH that is lower than 12.5 making it a non-RCRA waste. This solution is still shipped as hazardous (D002) waste. Generator knowledge is not used to profile the wastes at this facility.

#### Weekly Inspections:

A binder of weekly inspections for the 90 day storage area is kept at the facility for a minimum of 3 years. The thorough full-page forms include dates of wastes, container integrity, and comment areas. No weeks were missing from the binder.

#### Waste Minimization Plan:

No waste minimization plan is in place for this facility. A reduction in waste is economically not practical for AFR. Will Belitz does indicate on the annual report that a plan is not in place.

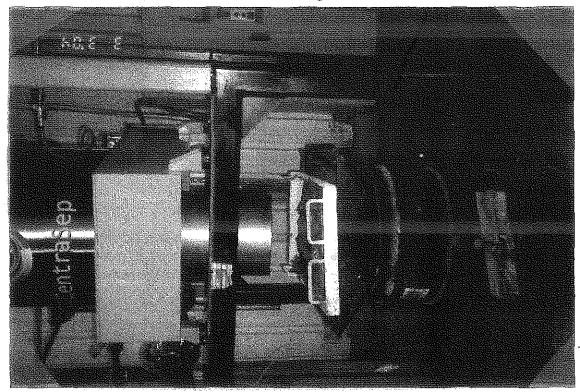
Items Received by Inspector During Inspection: Site Map 2003 Hazardous Waste Calculations Two pictures of the facility

Items Received by Inspector After Inspection: Amended Contingency Plan Three Hazardous Waste Profiles Facility Brochure

## APPENDIX 1

## Photo Log

1. Aluminum Dip Tank Area: The Centrifuge and Waste Paint drum.



2. Less than 90 Day Storage Area: Spring Lidded Roll-Off Box.



#### Michael Mcclary

To: Brenda Oswald/R5/USEPA/US@EPA

03/10/04 01:07 PM

Subject: Re: American Finishing Resources

Brenda-- I concur. Just take out the comma after "AFR" in the second line of the next to last paragraph. Very nice job.

:) Mike

Brenda Oswald



**Brenda Oswald** 

To: Michael Mcclary/R5/USEPA/US@EPA

03/10/2004 12:50 PM

cc:
Subject: Re: American Finishing Resources

It helps to actually attach the document.



Thanks,

Brenda D. Oswald Environmental Engineer U.S. EPA, Region 5

Ph: (312) 353-4796 Fx: (312) 353-4342



"Moeller, Jason W" <Jason.Moeller@dnr.s tate.wi.us> To: Brenda Oswald/R5/USEPA/US@EPA

CC:

Subject: RE: questions

03/09/04 04:13 PM

The draft looks good. What computer program are you using - word perfect? I can only view it, not open it, weird. I have Microsoft Word and it won't open your document. So, if you have a different format please send that next time.

Anyway, at the painting place, they preheat the metal and blow on the powder paint and it sticks, and it is sent through an oven to cure. I'm not sure how it sticks, but I think it has something to do with the electron charge.

Thanks, Jason.

----Original Message----

From: Oswald.Brenda@epamail.epa.gov [mailto:Oswald.Brenda@epamail.epa.gov] Sent: Tuesday, March 09, 2004 3:49 PM

To: Moeller, Jason W Subject: RE: questions

W10980901391

#### American Finishing Resources, Inc. 476 Clay Street Chilton, Wisconsin 53014

920-849-7738 Fax 920-849-2800

### Fax Cover Page

	Date: March 04, 2004
To: Brenda Oswald	<b>Telephone:</b> 312-492-5942
Company: US EPA	Fax: 312-353-4342

From: Will Belitz Telephone: 920-849-7738 Ext. 19
Fax: 920-849-2800

## Message

#### Good Afternoon:

Attached please find an updated copy of the emergency coordinator page from our emergency contingency plan. I will send a copy of the 15 page document via surface mail. I will not include the associated material safety data sheets unless you request them. I will include a copy of the company brochure that I described to you yesterday with the surface mailing. Attached also please find copies of the three waste analysis reports that you reviewed yesterday.

Please contact me at 920-849-7738 Ext. 19 as questions arise. Thank you for your assistance.

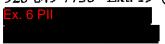
Sincerely,

Will Belitz Plant Services Mgr.

#### Emergency Coordinators:

#### Primary Coordinator:

Will Belitz, Plant Services Mgr. 1028 Center Street Route 2 Cleveland, WI 53015 920-849-7738 Ext. 19 (Work)



#### Secondary Coordinator:

Eric Ebben 5227 Maple Rock Road Reedsville, Wisconsin 54230 920-849-7738 Ext. 24 (Work)



#### Authority:

The owners and management of American Finishing Resources, Inc. are dedicated to the operation of a safe work place that carries out its work in an environmentally friendly manner. Accordingly, the emergency coordinators are hereby authorized to commit needed resources and manpower to carry out the requirements of this plan. This may entail the deputizing of knowledgeable employees and/or the hiring of an environmental response group.

#### Implementation of the Emergency Contingency Plan:

The contingency plan will be implemented if an accident occurs that has the potential to threaten human health, human life, or the environment. The emergency coordinator has full authority to implement the plan. The plan will be implemented according to the seriousness of the incident when any of the following events occur.

A truck carrying waste ash is involved in an incident that results in waste ash being spilled on company property or on a public roadway.

Waste ash is spilled within the facility during transfer or storage.

Leakage occurs in the liquid dip system tanks that contain process chemicals and waste ash residue.

Any substance listed on the American Finishing Resources, Inc. hazardous chemical inventory is released or spilled.



3303 Paine Avenue, Sheboygan, Wl 53081 (920)459-2500 Fax: (920)459-2503 www.cardinalenvironmental.com E mail:info@cardinalenvironmental.com

Will Belitz

American Finishing Resources

P.O. Box 164

Chilton, WI 53014-0000

Batch Number:

9352

Report Date:

10/16/2003

Date Received:

9/16/2003

Project Mgr (PM): SAH

Parameter	Result	Units		LOD	LOQ	Method	Analyst	Date Analyzed
Cardinal Sample Number: 71097 Sample Description: Chilton-W	Date Collected:	9/14/2003	Gra	ib				
Arsenic - TCLP	<0.013	mg/L	NLS	0.013	0.045	SW 6010B		9/29/2003
Barium - TCLP	1.23	mg/L		0.052	0.165	EPA 208.1	COK	10/1/2003
Cadmium - TCLP	0.278	mg/L		0.004	0.013	EPA 213.2	COK	10/1/2003
Chromium - TCLP	0.500	mg/L		0.018	0.057	EPA 218.2	COK	10/1/2003
Copper - TCLP	1.15	mg/L		0.004	0.013	EPA 220.1	COK	10/1/2003
Lead - TCLP	0.070	mg/L		0.04	0.127	EPA 239.1	COK	10/1/2003
Mercury - TCLP	0.070*	ug/L	NLS	0.05	0.1	SW 7470		10/7/2003
Nickel - TCLP	1.00	mg/L		0.026	0.083	EPA 249.1	COK	10/1/2003
Selenium - TCLP	<0.0044	mg/L		0.0044	0.014	EPA 270.2	COK	9/24/2003
Silver - TCLP	<0.014	mg/L		0.014	0.045	SW 7760A	COK	10/7/2003
Zinc - TCLP	130	mg/L		0.8	2.55	EPA 289.1	COK	10/1/2003
Flashpoint	>200	F				SW 1020	BLT	10/9/2003
pH, Laboratory	9.04	units				SM 4500 H+B	COK	9/22/2003
TCLP Extraction	DONE			, , ,		SW846 1311	COK	9/23/2003

Comments:

LOD Limit of Detection

Result estimated below the LOQ.

LOQ Limit of Quantitation

Result falls between LOD and LOQ

BSH High batch spike recovery, results may be biased high.

NLS Analyzed by Northern Lake Service, WI Lab Certification #721026460.

TET Analyzed by Thomas Edison Technical Contor, WI DNR #252021770.

Approved By:

Date: 13/16/153

PM: X6: 1 Date: 101 12103



3303 Paine Avenue, Sheboygan, WI 53081 (920)459-2500 Fax: (920)459-2503 www.cardinalenvironmental.com E mail:info@cordinalenvironmental.com

Will Belitz

American Finishing Resources

P.O. Box 164

Chilton, WI 53014-0000

9352 Batch Number:

Report Date:

10/16/2003

Date Received:

9/16/2003

Project Mgr (PM): SAH

Parameter	Result	Units	LOD	LOQ	Method	Analyst	Date Analyzed
Cardinal Sample Number: 71099	Date Collected:	9/14/2003	Grab				
Sample Description: Chilton-Al	uminum Process V	/aste				<u> </u>	
Arsonic - TCLP	0.030	mg/L	TET	0.001	SW 6010B		9/30/2003
Barium - TCLP	1.1	mg/L	TET	0.014	EPA 208.1		9/30/2003
Cadmium - TCLP	<0.003	mg/L	TET	0.003	EPA 213.2		9/30/2003
Chromium - TCLP	0.068	mg/L	TET	0.005	EPA 218.2		9/30/2003
Copper - TCLP	0.13	mg/L	TET	0.04	EPA 220.1		9/30/2003
Lead - TCLP	<0.06	mg/L	TET	0.06	EPA 239.1		9/30/2003
Mercury - TCLP	< 0.0034	mg/L	TET	0.0034	SW 7470		9/30/2003
Nickel - TCLP	0.024	mg/L	TET	0.08	EPA 249.1		9/30/2003
Selenium - TCLP	0.040	mg/L	TET	0.004	EPA 270.2		9/30/2003
Silver - TCLP	< 0.032	mg/L	TET	0.032	SW 7760A		9/30/2003
Zinc - TCLP	12.0	mg/L	TET	0.3	EPA 289.1		9/30/2003
Flashpoint	>210	F	TET		SW 1020A		10/10/2003
pH, Laboratory	10.20	units			SM 4500 H+B	COK	9/23/2003
TCLP Extraction	DONE				SW846 1311	, - ·	

Comments:

LOD Limit of Detection

Result estimated below the LOQ.

Limit of Quantitation LOQ

Result falls between LOD and LOQ

High batch spike recovery, results may be biased high. BSH

Analyzed by Northern Lake Service, WI Lab Certification #721026460. NLS

Analyzed by Thomas Edison Technical Center, WI DNR #252021770. TET

Approved By:

Date: /8/ 165

Dare: 10/17/03



3303 Paine Avenue, Sheboygan, WI 53081 (920)459-2500 Fax: (920)459-2503 www.cardinalenvironmental.com E mail:info@cardinalenvironmental.com

Will Belitz

American Finishing Resources

P.O. Box 164

Chilton, WI 53014-0000

Batch Number: 9352

Report Date:

10/16/2003

Date Received:

9/16/2003

Project Mgr (PM): SAH

Parameter	Result	Units	LOD	LOQ	Method	Analyst	Date Analyzed
Cardinal Sample Number: 71098	Date Collected: teel Process Waste		Grab				
Arsenic - TCLP	0.006	mg/L	TET	0.001	SW 6010B	· <del></del> 1	9/30/2003
Barium - TCLP	0.33	mg/L	TET	0.014	EPA 208.1		9/30/2003
Cadmium - TCLP	0.57	mg/L	TET	0.003	EPA 213.2		9/30/2003
Chromium - TCLP	0.059	mg/L	TET	0.005	EPA 218.2		9/30/2003
Copper - TCLP	0.27	mg/L	TET	0.04	EPA 220.1		9/30/2003
Lead - TCLP	1.4	mg/L	TET	0.06	EPA 239.1		9/30/2003
Mercury - TCLP	<0.0034	mg/L	TET	0.0034	SW 7470		9/30/2003
Nickel - TCLP	0.21	mg/L	TET	80.0	EPA 249.1		9/30/2003
Selenium - TCLP	0.031	mg/L	TET	0.004	EPA 270.2		9/30/2003
Silver - TCLP	<0.032	mg/L	TET	0.032	SW 7760A		9/30/2003
Zinc - TCLP	25.0	mg/L	TET	0.3	EPA 289.1		9/30/2003
Zinc - TCLP	25.0	mg/L	TET	0.3	EPA 289.1		9/30/2003
Flashpoint	>210	F	TET		SW 1020A		10/10/2003
pH, Laboratory	13.42	units			SM 4500 H+E	COK	9/23/2003
TCLP Extraction	DONE		TET	181 III 1827 W	SW846 1311		9/25/2003

Comments:

LOD Limit of Detection

Result estimated below the LOQ.

LOQ Limit of Quantitation

Result fails between LOD and LOQ

BSH High batch spike recovery, results may be blased high.

NLS Analyzed by Northern Lake Service, WI Lab Certification #721028480.

TET Analyzed by Thomas Edison Technical Center, WI DNR #252021770.

Approved By:

Date: 101/16/03

1: XU 7 Date: 10/12/02

#### American Finishing Resources, Inc. 476 Clay Street Chilton, Wisconsin 53014

920-849-7738 Fax 920-849-2800 www.afrnow.com

March 04, 2004

Brenda Oswald U.S. Environmental Protection Agency Region 5 77 W. Jackson Blvd (DE-9J) Chicago, Illinois 60604-3511

Good Afternoon:

Attached please find a copy of our *Emergency Contingency Plan* and a copy of our company brochure. Please contact me at 920-849-7738 Ext. 19 or <a href="wbelitz@afrnow.com">wbelitz@afrnow.com</a> as questions arise. Thank you for your consideration.

Sincerely,

Will Belitz



## American Finishing Resources, Inc. 476 Clay Street Chilton, Wisconsin 53014

Emergency Contingency Plan Updated March 04, 2004 American Finishing Resources, Inc. 476 Clay Street Chilton, Wisconsin 53014 920-849-7738 Fax 920-849-2800

## Emergency Contingency Plan Updated - March 04, 2004

Wisconsin Act 342
(Facility Emergency Planning)
and
Wisconsin Administrative Code NR 600
(Hazardous Waste Management)

#### **Contents**

This plan contains eighteen sections as indicated below:

- 1. General Information
- 2. Emergency Coordinators
- 3. Implementation of the Contingency Plan
- 4. Emergency Response Procedures Notifications
- 5. Containment and Control
- 6. Follow Up Action
- 7. Emergency Equipment
- 8. Coordination Agreements
- 9. Evacuation Plan
- 10. Severe Weather Plan
- 11. Required Reports
- 12. Hazardous Waste and Emergency Personnel Training
- 13. Chemical Processes
- 14. Plan Updates
- 15. Facility Site Plan
- 16. Facility Site Plan Key
- 17. Emergency Contact Telephone List

## **General Information**

## Company Name:

American Finishing Resources, Inc. (Formerly Thermal Clean, Inc.)

#### U.S. EPA Identification Number:

WID980901391

#### Standard Industrial Classification Number:

3479

#### Address:

476 Clay Street Chilton, Wisconsin 53014

#### Telephone and Fax:

Telephone 920-849-7738

Fax 920-849-2800

#### Facility Contact:

Will Belitz, Plant Service Mgr. 1028 Center Street Route 2 Cleveland, WI 53015 920-849-7738 Ext. 19 (Work)

Ex. 6 PII

wbelitz@afrnow.com

#### Owners:

Steven Stroobants
N2731 Driftwood Beach Road
Chilton, WI 53014
920-849-7738 Ext. 12 (Work)
Ex. 6 Pll (Home)

Keith Stroobants N3489 Minahan Road Chilton, WI 53014 920-849-7738 Ext. 16 (Work) Ex. 6 PII (Home)

#### Type of Facility:

The facility primary is engaged in the removal of paint coatings from steel substrates using a baking process to destroy the coatings and a system of caustic, rinse, and acidic baths to remove the resulting ash. Secondary processes use caustic materials to remove paint coatings from aluminum and steel substrates that have special characteristics.

#### Type of Waste:

Waste incineration ash containing chromium (EPA Waste Code D007).

Waste corrosive liquid (EPA Waste Code D002)

#### Facility Site Plan:

(Please see pages 12 and 13.)

#### Emergency Telephone List:

(Please see page 14 and 15.)

#### Activities:

Paint hooks and painted metal component parts are picked up via daily truck routes to customer manufacturing and painting facilities. Painted hooks and painted metal component parts are baked to remove paint to allow the customer to reuse clean hooks and metal component parts. Ash created during the baking process may or may not contain chromium, cadmium, lead, or zinc depending the composition of the paint being removed.

#### **Emergency Coordinators:**

#### Primary Coordinator:

Will Belitz, Plant Services Mgr. 1028 Center Street Route 2 Cleveland, WI 53015 920-849-7738 Ext. 19 (Work) Ex. 6 Pll (Home) Ex. 6 Pll (Cellular)

#### Secondary Coordinator:

Eric Ebben
5227 Maple Rock Road
Reedsville, Wisconsin 54230
920-849-7738 Ext. 24 (Work)

Ex. 6 Pll (Home)

Ex. 6 Pll (Cellular)

#### Authority:

The owners and management of American Finishing Resources, Inc. are dedicated to the operation of a safe work place that carries out its work in an environmentally friendly manner. Accordingly, the emergency coordinators are hereby authorized to commit needed resources and manpower to carry out the requirements of this plan. This may entail the deputizing of knowledgeable employees and/or the hiring of an environmental response group.

#### Implementation of the Emergency Contingency Plan:

The contingency plan will be implemented if an accident occurs that has the potential to threaten human health, human life, or the environment. The emergency coordinator has full authority to implement the plan. The plan will be implemented according to the seriousness of the incident when any of the following events occur.

A truck carrying waste ash is involved in an incident that results in waste ash being spilled on company property or on a public roadway.

Waste ash is spilled within the facility during transfer or storage.

Leakage occurs in the liquid dip system tanks that contain process chemicals and waste ash residue.

Any substance listed on the American Finishing Resources, Inc. hazardous chemical inventory is released or spilled.

A natural disaster affects employee or facility safety.

#### Emergency Response Procedures – Notifications:

Any employee discovering a fire or hazardous release that is not readily controllable with equipment and materials at hand must contact the emergency coordinator. If the event involves a fire the Chilton Fire Department (911) must be called.

All other employees must stop work, secure their work areas, and receive instructions from the emergency coordinators.

The emergency coordinator will assess the need for action and notify the appropriate individuals and/or agencies.

#### Containment and Control:

The emergency coordinator will assure that all the necessary steps to contain the hazard within the area and to prevent its spread to other areas are taken.

In the case of a spill, the hazardous material and any other material that it comes in contact with (soil, gravel, etc.) will be cleaned up using shovels and/or brooms and stored in secure containers that are properly labeled until a means of reclamation or disposal can be determined. The combination of any waste collected must be considered hazardous until proven otherwise by analysis.

#### Follow Up Action:

After the containment and control of an emergency the emergency coordinator will provide for proper collection, storage, and disposal of any hazardous wastes collected.

Contaminated soil, liquids, or other materials must be stored in properly closed and identified 55 gallon DOT 17-H approved steel drums and considered to be a hazardous waste until verified by analysis.

The emergency coordinator will assure that all emergency equipment is properly serviced and stored for future use.

The emergency coordinator and two (2) other qualified persons will investigate the cause of any incident and take steps to prevent a recurrence of the incident.

The emergency coordinator will assure that the cause of the incident has been eliminated and that restoration has progressed to the point where health and safety of the environment, employees, and area residents will not be jeopardized. The emergency coordinator must also make all required notifications to EPA, the State of Wisconsin, and local authorities.

Spills or releases that involve more than 100 pounds (approximately 13 gallons) or an amount over the reportable quantity for a hazardous substance must be reported along with the following information:

Name the chemical(s) involved.

Listing in SARA Title III Section 302 Extremely Hazardous Substances.

Estimated quantity of the released substance.

Time and duration of the release.

Medium into which the substance was released.

Health risks associated with the releases.

Steps and precautions taken in response to the release.

Name and telephone number of person to contact for additional information.

All information must be recorded during the response process to assure proper notification.

### Emergency Equipment:

The facility is equipped with necessary emergency equipment to assure a prompt end to a hazardous release or spill incident. An inventory of chemical fire extinguishers, shovels, brooms, pumps, hoses, absorbent material, respirators, boots, gloves, aprons, coveralls, and drums is maintained. A supply of additional equipment is available on a 24 hour per day basis.

#### Coordination Agreements:

Secondary response to a spill or release is available on a 24 hour basis through an environmental services company as listed below. No contract exists with Onyx Environmental Services. Onyx Environmental Services provides regular removal of waste materials for stabilization and disposal. A copy of this plan is being provided to Superior Special Services, Inc.

Onyx Environmental Services W124 N9451 Boundary Road

Menomonee Falls, Wisconsin 53051

General Contact: 800-255-5092

Dave Wheelis: Ex. 6 Pll (Home)
Dave Wheelis: Ex. 6 Pll (Cellular)
Dave Wheelis Pager: Ex. 6 Pll (Pager)

The Chilton Fire Department as listed below would provide response to an incident involving a fire. A copy of this plan is being provided to the Chilton Fire Department.

Chilton Fire Department 42 School Street Chilton, Wisconsin 53014 Emergency Contact: 911

General Contact: 920-849-2335

Jim Kurtz - Fire Chief: 920-849-9606

The Calumet Medical Center and Calumet Medical Center Ambulance on a 24 hour basis provide response to an incident involving injury. A copy of this plan is being provided to the Calumet Medical Center and Calumet Medical Center Ambulance.

Calumet Medical Center 614 Memorial Drive Chilton, Wisconsin 53014 Emergency Contact: 911 General Contact: 920-849-2386

Calumet Medical Center Ambulance 614 Memorial Drive Chilton, Wisconsin 53014 Emergency Contact: 911 General Contact: 920-848-2124

Evacuation Plan:

#### Dvacaanon 1 mn.

Facility personnel will be evacuated if the emergency coordinator decided that their personal safety is in danger. An order to evacuate the building would be communicated via the facility paging system and /or by means of a runner assigned by the emergency coordinator. All employees are to follow safe evacuation practices by safely exiting the facility at the nearest door in the event of an evacuation order. All employees who have safely exited the facility are required to assemble in the field south of American Finishing Resources, Inc. main office (See Facility Site Layout on pages 12 and 13) for roll call in order to assure that all employees are accounted for. No employee will be allowed to leave the assembly area or return to work until an all clear has been provided by the emergency coordinator.

#### Severe Weather Plan:

Facility personnel will seek immediate shelter in the event of extreme severe weather. Production facility will seek shelter in the men's restroom/showers facility. Main office employees will seek shelter in the main office restroom. A watch will be placed when tornado sightings are reported on the radio. An order or seek shelter would be communicated via the facility paging system and /or by means of a runner assigned by

the emergency coordinator. All employees are to follow safety practices by safely finding immediate shelter in the event of a severe weather avoidance order. All employees who have safely found shelter are to remain in that shelter until an all clear is sounded by the emergency coordinator. See Facility Site Layout on pages 12 and 13 for shelter locations.

#### Required Reports:

In the event of a release or spill the operator (through the emergency coordinator) will immediately notify the Wisconsin Department of Natural Resources as listed below. Initial notification will be provided via telephone and the follow up report will be submitted in writing. A copy of this plan is being provided to the Wisconsin Department of Natural Resources and to the United States Environmental Protection Agency.

Attention: Jason Moeller
State of Wisconsin
Department of Natural Resources
1125 N. Military Avenue
P.O. Box 10448
Green Bay, Wisconsin 54307-0448
920-492-5942
Fax: 920-492-5859
Jason.Moeller@dnr.state.wi.us

Attention: Brenda Oswald Environmental Protection Agency Region 5 77 W. Jackson Blvd. (DE-9J) Chicago, Illinois 60604-3511 312-353-4796 Fax:312-353-4342 Oswald.Brenda@epa.gov

#### Hazardous Waste and Emergency Personnel Training:

All employees will receive annual training designed to alert them to the potential hazards that can be encountered in their daily assigned work. At minimum this training includes:

Recognition of the fact that American Finishing Resources, Inc. is classified as a large quantity hazardous waste generator.

Recognition of the basic definition of hazardous wastes generator and the basic rules that must be followed.

Recognition of the required hazardous waste labels.

Recognition of the hazardous waste generation and storage areas.

Recognition of the precautions required of any person working in or entering the hazardous waste generation or storage areas.

Recognition of the required methods of handling and storing and disposing of hazardous waste.

Employees who must work in the hazardous waste generation and storage areas will receive detailed information relating to the source of the hazardous waste, the potential dangers, the protective methods, and all information relative to safe work practices.

Training methods include the use of hand outs, videos, posters, American Finishing Resources, Inc. written process operation instructions, flip charts, and actual work place product, equipment, chemicals, and waste samples.

#### Chemical Processes:

American Finishing Resources, Inc. uses a combination of baking and chemical processes in order to provide customers with hooks, fixtures, and component parts that have been properly cleaned of paint and residue. Material Safety Data Sheets for the process chemicals used at American Finishing Resources, Inc. is provided in the last section of the plan. A complete library of material safety data sheets for all materials used within the facility are maintained as a separate set of records. These are provided for safety purposes only and are to be considered as confidential. Chemicals used are as follows:

#### Production Processing Area:

Ammonyx Lo (Mazox LDA)

Chemtech Rust Inhibitor 500P

Challenge Rinse 6102 Rust Inhibitor

Challenge Paint Stripper 4420 (Aluminum Strip System)

Challenge Additive 4423 (Steel Strip System)

Paint Stripper 4401 (Steel Strip System)
Liquid Caustic Soda 50% D/C

Milco 150 (Freight Class 55)

Milport Heavy Duty Alkaline Cleaner (Product 6755)

Milport Inhibited Muriatic Acid (Product 1238)

Muriatic Acid 20 Deg.

Polyrad 1110-A

Potassium Hydroxide

#### Fabrication and Maintenance Areas:

C-10 Weld Gas (90% Argon, 10% Carbon Dioxide)

K1025 Weld Gas (Helium Tri Gas)

CD-50 Carbon Dioxide

L56-035 Weld Wire

308L-035 Weld Wire (Stainless)

Nozzle Kleen

Antispatter

Acetylene, Dissolved

Oxygen

#### Wastewater Pretreatment Area:

Hydrochloric Acid (Muriatic Acid)

50% Caustic Soda-Membrane (Reduced to 10% Concentration)

Clear Two "O" Alka 240

Clear Two "O" 1727 Coagulant

Challenge K-1526AM Flocculent

Ferric Chloride

#### General Plant:

Natural Gas

Liquid Propane Gas (LP)

#### Transportation:

Diesel Fuel

Antifreeze/Coolant

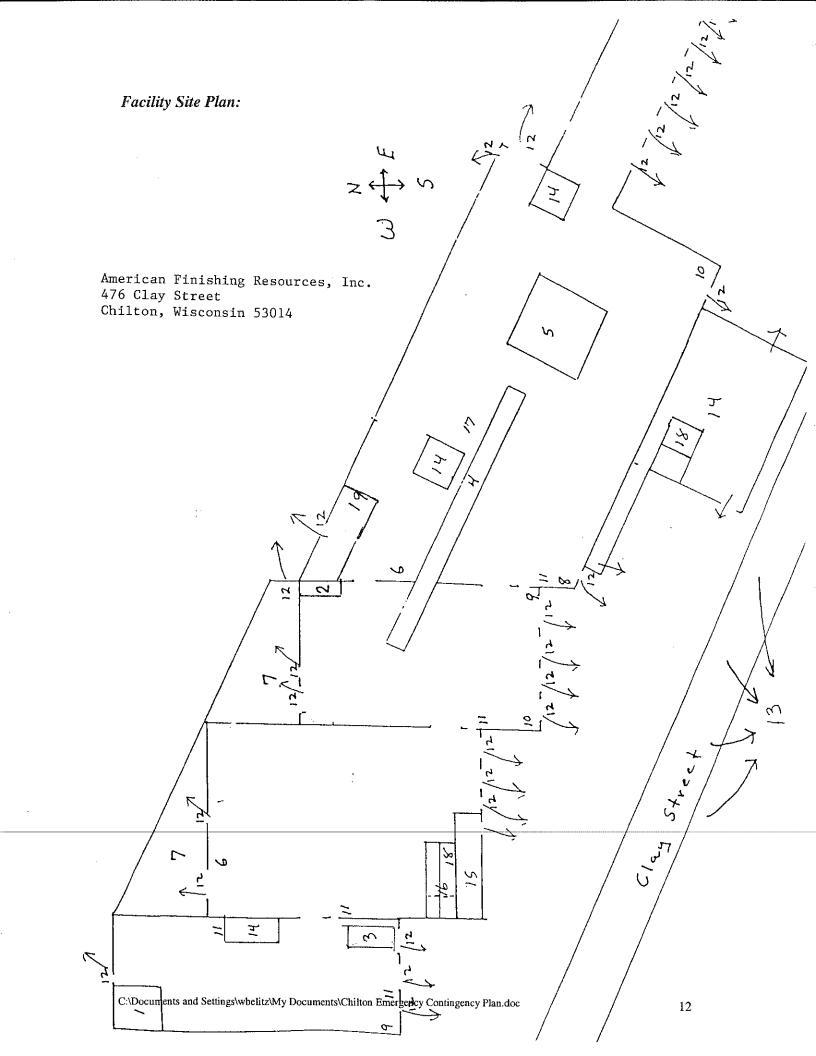
Transmission Oil

#### Plan Update:

This plan has been developed to meet the needs of American Finishing Resources, Inc. and its employees while also meeting the requirements of the regulatory agencies. Changes will be made as required by product mix or other impacting factors.

### Record of Plan Update:

December 10, 1998 – Will Belitz, Plant Services Mgr. June 07, 2001 – Alison Stroobants, Industrial Engineering Assistant March 04, 2004 – Will Belitz, Plant Services Mgr.



#### Facility Site Plan Key:

- 1. Wastewater Pretreatment System
- 2. Liquid Caustic Coatings Removal Area
- 3. Waste Ash Rolloff Container
- 4. Conveyorized Parts Washer
- 5. Dip System (Caustic, Rinse, Acid, Rinse, Rinse, Caustic)
- 6. Chemical Storage (Caustic, Acid, Rust Inhibitors)
- 7. Outdoor Break Area and Covered Storage Area
- 8. Natural Gas Meter and Valves
- 9. Electrical Mains (Two)
- 10. Fire Sprinkler Valves (Two)
- 11. Light Switches
- 12. Exits (Walk Through and Overhead Doors)
- 13. Evacuation Assembly and Roll Call Area
- 14. Offices
- 15. Break and Meeting Area
- 16. Employee Restroom/Shower Area
- 17. Emergency Eye Wash and Shower
- 18. Severe Weather Shelter

## Emergency Telephone List:

Hospital		
Calumet Medical Center		.849-2386
614 Memorial Drive, Chilton, WI 53014	Emergency	911
Ambulance		
Calumet Medical Center		.849-2124
614 Memorial Drive, Chilton, WI 53014	Emergency	911
Nonemergency Immediate Care		
Dr. Randy Theiler		.849-9375
451 East Brooklyn Street, Chilton, WI 53014		
Fire		
Chilton Fire Department		849-2335
42 School Street, Chilton, WI 53014	Emergency	911
Jim Kurtz – Fire Chief		849-9606
Sheriff		
Calumet County Sheriff's Department		849-2335
206 Court Street, Chilton, WI 53014	Emergency	911
Wastewater Treatment Plant – Glen Pingel		
Chilton Wastewater Treatment Plant		.849-9562
East Main Street, Chilton, WI 53014		
Director of Public Works		
Todd Schwarze		.849-2616
42 School Street, Chilton, WI 53014		
Spill Response and Recovery – Hazardous Materials		
Onyx Environmental Services	800	-255-5092
W124 N9451 Boundary Road		
Menomonee Falls, WI 53051		
Mark Wheelis Home	920	-684-0372
Dave Wheelis Cellular	920	-323-4089
Dave Wheelis Pager	920	-576-6238
Environmental Consultation – Jim Baird, Tom Friedrichs		
Cardinal Environmental Services	800-	413-7225
3303 Paine Avenue, Sheboygan, WI 53081		
Environmental Consultation – Rick Fulk, Ryan Fulk		
River's Bend Engineering	262	-886-3882
1139 Sunnyslope Road, Racine, WI 53406		
Wisconsin Department of Natural Resources		
Northeast Regional Headquarters		
1298 Lombardi Avenue, Green Bay, WI 54304	Fax 920	-492-5859
Report Toxic Chemical Spills		
National Response Center	800-	424-8802
Emergency Assistance		
Transportation (Chemtrac)	800	-424-9300
Medical (Rocky Mountain Poison Control)	800-	726-3737

Wisconsin Public Service Corp.		
Natural Gas Leak or Emergency	• • • • • • • • • • • • • • • • • • • •	800-450-7280
Electric Service Emergency or Outrage		
		849-2356
Digger's Hotline		800-242-8511
Fire Sprinkler and Security Alarm Monitoring		
Security Link – Monitoring Center		800-468-4085
2500 North Lynndale Drive	Service	800-582-8197
Appleton, WI 54914	Service	920-733-2322
Electrical Contractor		
Brantmeier Electric, Inc		849-2533
422 East Breed Street	Mike Brantmeier	849-7011
Chilton, WI 53014		
American Finishing Resources, Inc.		
Will Belitz, Plant Safety and Environmental		920-849-7738
	Home	Ex. 6 PII
	Cellular	Ex. 6 PII
Eric Ebben, Plant Safety and Maintenance		920-849-7738
	Home	Ex. 6 PII
	Cellular	Ex. 6 PII

## **Emergency Reporting Information:**

- 1. Name of company and address/location of incident.
- 2. Name of caller and return telephone number.
- 3. Name of on-site emergency coordinator.
- 4. Type of emergency.
- 5. Type and quantity of hazardous material involved.
- 6. Assessment of the situation and additional potential hazards.

#### LARGE QUANTITY GENERATOR INSPECTION FORM HAZARDOUS WASTE MANAGEMENT PROGRAM WISCONSIN DEPARTMENT OF NATURAL RESOURCES

GENERAL INFORMATION DEPARTMENT INFORMATION DNR District: NORTHEAST Inspection date: MARCH 3,2004 DNR Inspector(s) JASON MOELLER GENERATOR INFORMATION EPA ID: WID 980901391 FID: 408005730 Corporate/Generator Name: AMERICAN FINISHING RESOURCES, INC. Generator Location: Street: 476 CLAY STREET City: CHUTON County: CALUMET Zip: 53014 Site Personnel Present: WILL BELITZ Title: SERVICES MANAGER Doug POE PREXIDENT Generator Mailing Address: Street: \_ P.O. Box 164 State: WI Zip: 53014 City: CHILTON Phone: \_ (920) 849-7738 Operator: Title: Legal Owner: STEVEN STROOBANTS Title: OUNER Street: N2731 PRIFTWOOD BEACH ROAD City: CHILTON State: WT Zip: 53014 Thone: 920 849 7738 × 12 Company Product/Main Process: PAINT AND CONTINGS REMOVAL ENGINEERING & FABRICATION OF PAINT HOOKS & RACKS

## II. SUMMARY TABLE

	<u>Waste Type</u>	Generation Rate/Month		LDR Status+	Exceeds Treatment Standards Yes/No	Waste <u>Handling*</u>
1) C	hromium AsH	20 Y3	D007		No	
2) Pa	CFLITTER CAKE) TASSIUM HYDROKIDE 2-Amino Ethanol	250 jal	D007		No	
3)	2-mino Ciación			<del></del>		
4)		·				
<u>5)</u>		· .			<del></del>	
<u>6)</u>				····		
7)						
8)				_		
1. 2. 3.	Status - use the f F001-F005 Solvent F020-F023, F026-F California list (	s (NR 675.11 028, Dioxins NR 675.13)	) (NR 675.12)	6.	Second 3rd (NR Third 3rd (NR	R 675.15)
III.	NOTIFICATION: NR	615.07				
Α.	Has the generator and obtained an i			n form to t	-	Yes No
В.		erator chang aste activit	ed its owner ies?	ship or add	led new	Yes (No
	2. Has a subse	quent notifi	cation form	been comple	ted?	Yes No NA
C.			ed its corpo ess and/or w		no change in (	Yes No
	2. Has a lette form been c		EPA or a su	bsequent no	tification (	Yes No NA
Comme	nts: Change	name fro	m Therma	el Clean	approximate	ly 5 years to

### IV. WASTE STREAM INFORMATION

A. Waste Determination NR 605.12, NR 615.06, NR 67	٩.	Waste	Determination	NR	605.12,	NR	615.06,	NR	67
--	----	-------	---------------	----	---------	----	---------	----	----

Have all wastes been correctly identified, and if necessary, tested to obtain enough information to treat, store or dispose of the waste properly. (NR 675) Yes N

If no, list those not identified correctly below:

Note: The inspector should determine if the generator has made a hazardous waste determination on all solid waste generated, including compliance with the TCLP requirements of NR 675.07 and NR 605.08(5)

2.	Are records of test results, waste analyses, or other determinations retained on site for at least 3 years from the date waste last sent to a TSD facility?	) No	
3.	Have waste samples been analyzed by a laboratory certified or registered under Chapter NR 149, Wis. Adm. Code for all analyses performed? NR 605.12(1)	) No	
4.	Have both the listed and characteristic waste code been Yes assigned where a listed waste exhibits a characteristic?  NR 675.09	No	(
5.	Has multi-source leachate been assigned the F039 waste Yes code?* NR 605.09(2)	No	(
	*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.		
	If yes, was single-source leachate combined to form multi- Yes source leachate?	No	
6.	If any process has changed that affected solid waste characteristics, has the generator made a new hazardous waste determination? NR 615.06(4)	) No	

1.		F005 Spent Solvent Wastes; F020-F023 and F026-F028 in Wastes; First, Second, and Third 3rd Wastes:			
	<b>a</b> .	Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?	Yes	No	
		If available, list each waste code and check correct treatability group.			
		Waste Code Subcategory Wastewater* Nonwastewater			
			£		
		Subcategory-see NR 675.21, Table Constituent Concentrations in Waste Extract, or NR 675.22, Tables 2 and 3 Technology-Based Standards			
		*Wastewater-less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. NR 600.03(237m)			
	Ъ.	Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? NR 675.09(2)	Yes	No	
	c.	Does the generator specify alternative treatment standards for lab packs?	Yes	No	
		If yes, do lab packs only contain the following wastes? NR 675.22(4)(b)			
		Organometallics: NR 675 Appendix III			
		Organics: NR 675 Appendix IV			
	<b>d</b> .	Does the generator specify alternative treatment standards for F039 multi-source leachate?	Yes	No	
2.	iden: stand	fornia List Wastes: Has the generator correctly tified the treatability group and treatment dard/prohibition level for the following wastes?			
	а.	Liquid hazardous wastes containing PCBs - ≥50 ppm	Yes	No	

		b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content.	Yes	No	NA
		If yes, check the appropriate treatability group:			
		Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)  All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)			
		c. Liquid hazardous wastes that exhibit a characteristic and also contain $\ge 134$ mg/l nickel and/or $\ge 130$ mg/l thallium.	Yes	No	NA
	3.	Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in NR 675.22?	'Yes	No	NA
	·	If yes, list the waste code, the technology specified in NR 675.22, the alternative method, and documentation of approval. NR 675.22(2)			
		Required Alternative <u>Waste Code Technology Method</u> <u>Approval</u>			
	4.	Does the generator mix restricted wastes with different treatment standards for a constituent of concern?	Yes	No	
		If yes, did the generator select the most stringent treatment standards? (NR 675.21(2) and NR 675.23(2))	Yes	No	NA
Comme	nts:				<u> </u>
C.	Waste	Analysis			
	1.	Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? NR 675.07(1)	Yes	No	
	2.	If the answer to question 1 is no, does the generator ship all restricted wastes as not meeting treatment standards? If yes, go to question 4.	Yes	No	NA

		6			
3.	gener	of the following analytical methods does the ator employ? Under each method, list the specific as and pertinent documentation. NR 675.07	ر ح		
	а.	Knowledge of waste:	Tes	) No	NA
			-		
	<b>b</b> .	TCLP: Are wastes with treatment standards specified in NR 675.21 and 40 CFR 268.41 analyzed using TCLP? BDAT = stabilization/immobilization technology.	es	) No	NA
			<del>-</del>		
			,		
	c.	Total constituent analysis: Are wastes with treatment standards specified in NR 675.23 analyzed using total constituent analysis? (BDAT - destruction/removal technology)	Yes	No	NA
			- -		
	d.	PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste?	Yes	No	(NA
		*PFLT - Paint filter liquids Test [Test Method 9095, EPA Publication No. SW-846]		*	
			<del>-</del>		
4.	Dilut	tion Prohibition NR 675.06:			,
	<b>a.</b>	Does the generator mix prohibited wastes with different treatment standards?	Yes	No	
		List the wastes			
		Are the wastes amenable to the same type of treatment?	Yes	No	NA

b. Does the generator dilute prohibited wastes to meet the treatment standard criteria, or render them nonhazardous? If no, go to c. Check appropriate category: Dilutes to meet treatment standards Dilutes to render waste nonhazardous Do the wastes fall into the following categories? (Check if appropriate.) Managed in treatment systems regulated under the Chapter 147, Wis. Stats. Nontoxic\* characteristic wastes Treatment standard specified in NR 675.21 or NR 675.23 \*Nontoxic = D001 (except high TOC nonwestewaters), D002, and D003 (except cyanides and sulfides) If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. Based on an assessment of points a and b, and any С. other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? NR 675.06 5. F039 Multi-source leachate: Has the generator run an Yes initial analysis for all constituents of concern in NR 675.21 and NR 675.23? Comments: V. ON-SITE MANAGEMENT

Yes

No

If the generator treats characteristic wastes in systems

WPDES permit are not prohibited (if applicable)?

regulated under Chapter 147, Wis. Stats., have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an

Α.

If the generator treats characteristic wastes in RCRA exempt No В. Yes units to render them nonhazardous, are the wastes managed as restricted until NR 675 treatment standards are met?\* NR 675.09(4) \*This applies to both concentration based treatment standards specified in NR 675.21 and NR 675.23, and to some NR 675.22 required methods which result in treatment below the characteristic level. See Appendix D of the U.S. EPA land disposal restrictions package. (Third 3rd) Treatment Using NR 630 Exempt Units or Processes С. Are restricted wastes treated in NR 630 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)? If no, go to section VI. Type of Treatment Units Treatment and Process <u>Waste Type</u> Waste Code 2. Are treatment residuals generated from these units? No Yes 3. Are residuals further treated, stored for greater than 90 Yes No days, or disposed on site? If yes, the generator is also is a TSD Comments: VI. OFF-SITE MANAGEMENT AND MANIFEST REQUIREMENTS Manifest Requirements: NR 615.08, 615.09, 615.11(2), 615.12 & 615.13 Α. 1. Does the generator initiate a uniform manifest form with No Yes all off-site shipments of hazardous waste? NR 615.08(1) 2. Are copies of all manifests for the past 3 years retained No by the generator and available for review? NR 615.08(7) 3. Does the manifest specify a designated facility which is No

Does the generator properly route manifest copies to the Department and the consignment state (if waste was shipped out of state)? NR 615.08(6), (9) & (10)

No

permitted, licensed, or exempt from permitting or licensing

Are procedures for exception reporting followed properly,

and approved to take the waste? NR 615.08(3)

if an exception has occurred? NR 615.11(2)

		6.	Are the manifests properly completed? NR 615.08(8)(a)-(1)	Yes	No	
		7.	If verifiable, is waste packaged marked and labeled in accordance with DOT regulations concerning hazardous materials? NR 615.08(8)(f), NR 615.09(1) and (2)	Yes	No (	NA)
		8.	Does the generator offer the initial transporter of the hazardous waste the appropriate placards required by DOT regulations? NR 615.09(3)	Yes	No.	
	Comme	nts: _				<del> </del>
-	В.	Off-S	ite Management: Waste Exceeds Treatment Standards			
		1.	Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?	Yes	No	
			If no, go to C.			
		2.	Does the generator provide a notification to the treatment or storage facility with each waste shipment? NR 675.07(1)(1)	Yes	No	(NP)
	·	3.	If the generator specifies alternative treatment standards for lab packs, is the certification required in NR $675.07(1)(j)$ or $(k)$ included with the notification for each shipment?	Yes	No	(NA)
	C.	Off-S	ite Management: Waste Meets Treatment Standards	$\sim$		
		1.	Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?	Yes	No	
			If no, go to D.			
		2.	Does the generator provide a notification and a certification to the disposal facility with each waste shipment? NR 675.07(1)(b)	Yes	No	NA
		3	Are characteristic wastes which have been rendered nonhazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?	Yes	No	(NA)
			$\cdot$			

D.	Recor	-de	Rat	ention	٠.
IJ.	Verni		REL	ention	

 Does the generator retain on site copies of all LDR notifications, certification, and other relevant documents for a period of 5 years? NR 675.07(1)(e)



No

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case-by-case extensions and the soft hammer provisions?



No NA

Note: See summary table on page 2, (treatment standards column).

#### VII. ANNUAL REPORTING NR 615.11(1)

A. Have Annual reports covering generator activities during the previous calendar years been submitted?



No

Comments:

# VIII. CONTINGENCY PLAN AND SAFETY REQUIREMENTS NR 615.05(4)(a)5 and NR 630.22

A. Does the generator have a <u>written</u> contingency plan addressing potential discharge of hazardous waste or hazardous waste constituents to air, land, groundwater, or surface water?

NR 630.22(1)(a)



No

Note: If the answer is no, go to IX.

B. Is the contingency plan and all revisions kept by the generator and have they been filed with the Department and been sent to all local police and fire departments, hospitals and emergency response teams who may be called to provide emergency services? NR 630.22(1)(b)

Yes No

C. Does the plan identify an Emergency Coordinator (including name, position, home address, home and business phone) who is present at all times when the generator is in operation, and present or on call when the generator is not in operation and available to respond to an emergency by reaching the site in a short period of time? NR 630.22(1)(d) and NR 630.22(1)(e)1



D. Does the Emergency Coordinator have the authority and training necessary in the event of an emergency? NR 630.22(1)(d)

(ves) No

### Does the plan contain the following:

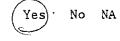
 A description of the site layout, types of waste handled their associated hazards, places where site personnel normally work, and entrances to and roads inside the site? NR 630.22(1)(e)2



2. An evacuation plan for the site personnel, including signal(s) to be used to begin evacuation, evacuation roads, and alternative routes? NR 630.22(1)(e)3



- 3. Procedures for emergency shutdown of operations, and the actions personnel must take to comply with NR 630.22(1)(a) in response to an emergency including, as appropriate, procedures to:
  - a) Activate internal alarms or communication systems to notify all personnel of an imminent or actual emergency situation, where applicable? NR 630.22(2)(a)1.



b) Telephone the Division of Emergency Government at 608/266-3232 and comply with the requirements of s. 144.76, Stats., and Chapter NR 158, Wis. Adm. Code? NR 630.22(2)(a)2

Yes No NA

c) Immediately identify the character, source, amount, and areal extent of any discharged materials?

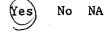
NR 630.22(2)(a)3



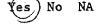
d) Assess possible hazards to human health or the environment that may result from discharge, fire, or explosion? NR 630.22(2)(a)4



e) Immediately notify appropriate local authorities, if an assessment indicates that a discharge, fire, or explosion could threaten human health or the environment outside the site, and that evacuation of local areas may be advisable? NR 630.22(2)(a)5.



f) Take all reasonable measures necessary to ensure that fires, explosions, and discharges do not occur, reoccur, or spread to other hazardous waste at the site? NR 630.22(2)(a)6



g) Monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, where appropriate, if the generator stops operation in response to a fire, explosion, or discharge?

NR 630.22(2)(a)7



h) Provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a discharge, fire, or explosion at the facility, immediately after an emergency? NR 630.22(2)(a)8

Yes

No NA

i) Ensure that, in the affected areas of the site, no waste that may be incompatible with the discharged materials is treated, stored, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed? NR 630.22(2)(a)9



s) No

j) Procedures to be used to notify local police and fire departments, hospitals and emergency response teams of a discharge of hazardous waste or a fire or explosion at the site? NR 630.22(1)(e)5



No

k) Notify the Department and appropriate local authorities before operations are resumed? NR 630.22(2)(b)



1) An up-to-date list of all emergency equipment at the site, including the location, physical description and a brief outline of its capabilities for each item? NR 630.22(1)(e)6



No

F. Does the contingency plan need to be amended due to changes? NR 630.22(1)(c)1-5



No

Note: The inspector shall ensure that the plan is site specific, that there are emergency coordinators assigned for all shifts, and that all personnel are trained in evacuation procedures.

# Comments: Update Backup Emergency Coordinator

IX. PERSONNEL TRAINING/RECORDS: NR 615.05(4)(a)5 & 630.16

A. Does the generator have a program of classroom instruction or onthe-job training for personnel in hazardous waste management procedures? NR 630.16(1)



No

If the answer is no, then a training program must be developed; go to X.

B. Does this program include training of personnel in Contingency Plan implementation? NR 630.16(1)(a)



C. Do personnel take part in an annual review of initial training? NR 630.16(3)



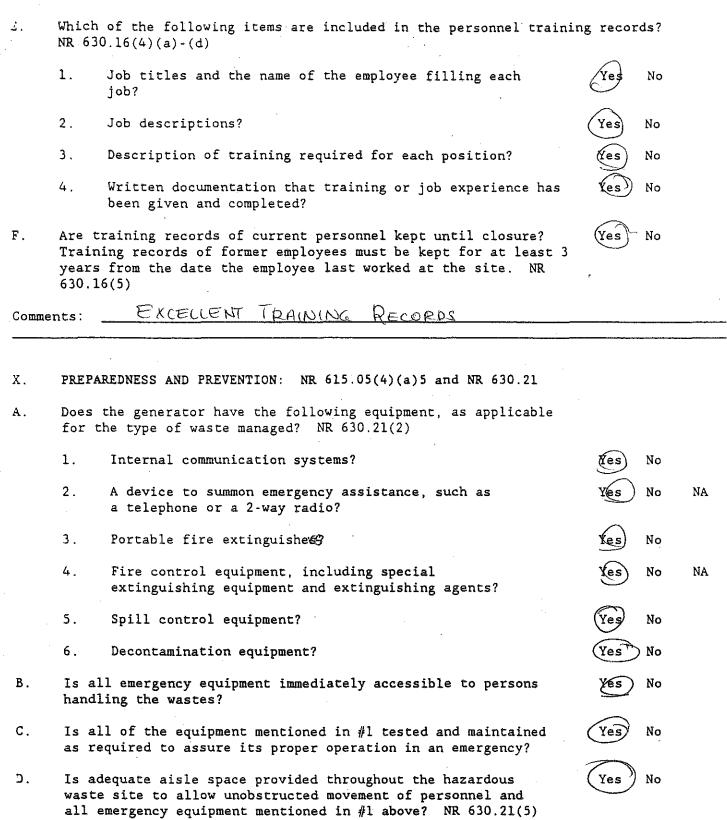
No

No

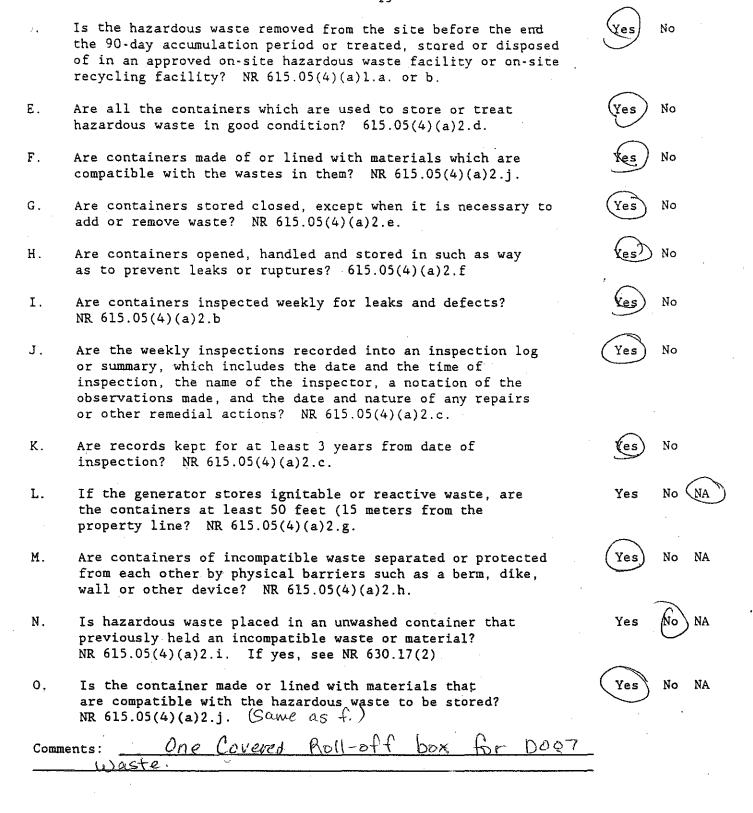
D. Are records of personnel training maintained by the generator? NR 630.16(4)



If the answer is no, then these records must be developed and maintained by the generator; go to X,



E.	Has the generator made service arrangements with the following groappropriate for the type of waste handled at the facility and the potential need for the services?	
	<ol> <li>Familiarized police, fire dept. and emergency response team with facility layout, properties of hazardous waste hazardous waste handled, and associated hazards. NR 630.21(6)(a)</li> </ol>	Yes No
	<ol> <li>Where more than one police and fire dept. may respond to an emergency, designated primary emergency authority. NR 630.21(6)(b)</li> </ol>	(Yes) No
	<ol> <li>Made agreements with state emergency response teams, emergency response contractors and equipment suppliers. NR 630.21(6)(c)</li> </ol>	Yes No
	4. Familiarized local hospital with properties of hazardous waste handled at the facility and the types of illness or injury that could result from exposure. NR 630.21(6)(d)	Mes No
Comme	nts:	
17 T	ORNER BEOUTDEVENEC	
XI.	OTHER REQUIREMENTS	
Α.	Does the generator have spill containment tanks?	Yes No
	If the answer is yes, then complete the appropriate attachment.	
В.	Does the generator combine absorbent material with waste generated on site?	Yes No
	If the answer is yes, complete the appropriate attachment.	
XII.	90-DAY CONTAINER ACCUMULATION: NR 615.05(4)(a) & 615.09(2)(a)	
. •	NOTE: Containers and tanks are the only means allowed to store large quantities of hazardous waste and be eligible for the 90-day exemption. Any other means of storage, such as waste piles, require an interim or operating storage license/variance. (See the definitions of container, tank and pile in NR 600.03). If waste is stored in tanks, complete attachment for tanks.	
Α.	Does this generator accumulate hazardous waste in containers?	Yes No
	If no, skip this section.  If yes, continue below.  Roll-off Box	
В.	Are the containers marked with the date on which hazardous waste was first placed in the container for accumulation? NR 615.05(4)(a)4	Yes No
C.	Are containers marked with the words "Hazardous Waste" before placing them in an accumulation area or on-site storage area? NR 615.09(2)(a)	(es) No



### XIII. SATELLITE ACCUMULATION NR 615.05(4)(c)

Α.	Does o	the generator accumulate waste at or near the generation?	Yes	No
		continue below.		
	1.	Is the container in good condition? NR 615.05(4)(c)1.	Yes	No
	2.	Is the container always closed except when it is necessary to add or remove waste? NR 615.05(4)(c)2.	Yes	No
•	3.	Is the container lined or compatible with the waste being accumulated? NR $615.05(4)(c)4$ .	Yes	No
	4.	Is the container marked with words "Hazardous Waste" or with other words that correctly identify the contents of the container? NR 615.05(4)(c)5.	Yes	No
	5.	Have 55 gallons or more of hazardous waste accumulated at or near the generation point? NR $615.05(4)(c)6$ .	Yes	No NA
·	6.	Has one quart or more of acutely hazardous waste listed in section NR $605.09(2)(a)$ , Table II, or $(3)(b)$ , Table IV, accumulated at or near the generation point? NR $615.05(4)(c)6$ .	Yes	No NA
		If the answer to either e or f is yes, then the facility must comply with applicable generator requirements of NR 615.05(4)(a) for this waste (90-day accumulation).		
XIV.	WASTE	MINIMIZATION		
manif	est th	615.08(8)(k) requires the generator to certify on the hazardo at he/she has a program in place to reduce the volume and tox ated to the degree economically practicable.		
Α.		the generator have a waste minimization/pollution ntion plan or other written documentation of their program?	Yes	No
	-	s, can the generator document that a program is being mented?	Yes	No NA
		, can the generator provide other evidence to justify their minimization certification?	Yes	No NA
В.	Make	for visual evidence that there is a waste minimization progra appropriate suggestions for their consideration and provide t tment literature and information sources.		
Comme	nts	NASCE Minimization equals business minimi	zatio	1.

٧.	STATUS EVALUATION
A.,	Classification Based on District Verification:
	Note: If the inspection-verified classification is different from the current notification status, a <u>status change form (Form 4430-12)</u> should be completed and attached.
	Signature: Bula Corneld Date: 3-4-04
	This generator is also subject to regulation as a:
	Treatment Facility (specify container, tank, other)
	Exempt Treatment Facility (specify)
	Transfer Facility
	Storage Facility (specify, container, tank)
	Exempt Storage Facility (specify)
	Disposal Facility
	Transporter

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